

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO

IN RE:	)	CASE NO: 14-16960
	)	
JACQUELINE BRYANT,	)	ADVERSARY NO: 15-01030
	)	
Debtor.	)	CHAPTER 7 PROCEEDINGS
	)	
STEVEN S. DAVIS, TRUSTEE	)	JUDGE PAT E. MORGENSTERN-
IN BANKRUPTCY	)	CLARREN
	)	
Plaintiff,	)	<b><u>ANSWER TO COMPLAINT</u></b>
	)	
vs.	)	
	)	
JACQUELINE BRYANT, et al.	)	
	)	
Defendants.	)	

**ANSWER**

Now comes the Defendant, Jacqueline Bryant, by and through counsel, and for her Answer to Plaintiff's Complaint states as follows:

1. Defendant denies each and every allegation not specifically admitted to herein.
2. Defendant Admits the allegations contained in paragraph 1 of the Complaint.
3. Defendant Admits the allegations contained in paragraph 2 of the Complaint.
4. Defendant Admits the allegations contained in paragraph 3 of the Complaint.
5. Defendant Admits the allegations contained in paragraph 4 of the Complaint.
6. Defendant Admits the allegations contained in Paragraph 5 of the Complaint.
7. Defendant Admits the allegations contained in Paragraph 6 of the Complaint.

8. Defendant Admits the allegations contained in Paragraph 7 of the Complaint.
9. Defendant Admits the allegations contained in Paragraph 8 of the Complaint.
10. In response to the allegations contained in paragraph 9 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
11. In response to the allegations contained in paragraph 10 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
12. In response to the allegations contained in paragraph 11 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
13. In response to the allegations contained in paragraph 12 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
14. In response to the allegations contained in paragraph 13 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
15. In response to the allegations contained in paragraph 14 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
16. In response to the allegations contained in paragraph 15 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
17. In response to the allegations contained in paragraph 16 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
18. In response to the allegations contained in paragraph 17 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
19. In response to the allegations contained in paragraph 18 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

20. In response to the allegations contained in paragraph 19 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
21. In response to the allegations contained in paragraph 20 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
22. In response to the allegations contained in paragraph 21 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
23. In response to the allegations contained in paragraph 22 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
24. In response to the allegations contained in paragraph 23 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
25. In response to the allegations contained in paragraph 24 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
26. Defendant Admits the allegations contained in Paragraph 25 of the Complaint.
27. Defendant Admits the allegations contained in Paragraph 26 of the Complaint.
28. In response to the allegations contained in paragraph 27 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
29. In response to the allegations contained in paragraph 28 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.
30. Defendant Admits the allegations contained in Paragraph 29 of the Complaint.
31. In response to the allegations contained in paragraph 30 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

32. In response to the allegations contained in paragraph 31 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

33. In response to the allegations contained in paragraph 32 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

34. In response to the allegations contained in paragraph 33 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

35. In response to the allegations contained in paragraph 34 of Plaintiff's Complaint, Defendant neither admits nor denies due to lack of information upon which to form a belief. Defendant leaves Plaintiff to its proofs.

WHEREFORE, having answered the Plaintiff's Complaint, Defendant raises the following defenses, including Affirmative Defenses.

1. Plaintiff has failed to state a claim upon which relief can be granted.
2. Defendant is entitled to her homestead exemption pursuant to O.R.C. § 2329.66(A)(1).
3. Defendant reserves the right to add additional defenses, including Affirmative Defenses, as discovery proceeds in this case.

WHEREFORE, Defendant prays that this complaint be dismissed and she be awarded her costs for defending this action.

Respectfully Submitted,

**J.P. AMOURGIS & ASSOCIATES**

/s/Jamie M. Nagle

Jamie M. Nagle (0075205)

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## **CERTIFICATE OF SERVICE**

I certify that on March 13, 2015 a true and correct copy of the foregoing Answer was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Robert D. Barr, on behalf of Steven S. Davis, Trustee, at [rbarr@dsb-law.com](mailto:rbarr@dsb-law.com)

Keith Rucinski, on behalf of Chapter 13 Trustee's office at [krucinski@ch13akron.com](mailto:krucinski@ch13akron.com)

Cleveland Office of the United States Trustee, on behalf of Daniel M. McDermott, United States Trustee, at the registered address of the US Trustee @ USDOJ.gov established with the bankruptcy court.

And by regular U.S. mail, postage prepaid, on:

Jacqueline Bryant  
21406 Kenyon Drive  
Cleveland, OH 44137

Respectfully Submitted,

**J.P. AMOURGIS & ASSOCIATES**

/s/Jamie M. Nagle

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